"This reasoning is not applicable to actions of debt upon specialties. In such actions the declaration is directly on the obligation contained in the instrument, . . and can not be sustained upon any subsequent promise of less solemnity." The simple promise to pay the debt, implied from the payment of interest, is merged in the higher obligation. *Toothaker* v. *City of Boulder*, 22 Pac. Rep. 468 (Col.).

TRUSTS — BEQUESTS TO CHARITABLE USES. — This was an appeal from a decree setting aside a bequest to Henry George, for the publication and distribution of his works. The decision went on the ground that George's writings are subversive of existing laws and that their publication is not a charity. *Held*, that the education of the public is a proper charity, provided it does not tend to corruption of morals or religion and is not opposed to any legal rule, and that agitation for a change in the law is perfectly proper unless illegally conducted. The bequest was sustained. *George* v. *Braddock*, 18 Atl. Rep. 881 (N. J.).

The same point was raised in an interesting case, that occurred before the late war, *Jackson* v. *Phillips*, 9 Allen, 539, where a bequest for the publication of abolitionist literature was contested on grounds similar to those in the present case. The bequest was held valid.

WILLS — CONSTRUCTION — EVIDENCE. — Where, in a will devising all of testator's real and personal estate, the testator devises a tract of land, described as the "west half of the south-west quarter" of a certain section, evidence cannot be introduced that the testator never owned this piece, but did own the "west half of the north-east quarter" of the same section. *Sturgis* v. *Work*, 22 N. E. Rep. 996 (Ind.).

It seems that with this evidence, taken in connection with the rest of the will, the court might properly have found that there was sufficient to carry the land which the testator really owned, even omitting entirely the words of the particular description. At least, it was proper to receive the evidence, even though it might finally be decided that the will could not be construed to carry this piece of land. Although a testator in incorrectly describing his own property has accurately described something which he does not own, yet that defect may be cured by construction, as well as if the incorrect description did not accurately apply to anything else in the world. And in this case, as in all cases of interpreting a will, all material facts, other than direct evidence of the testator's intention, which are admissable under the general rules of evidence may be looked at. See Wigram, Interpretation of Wills, Prop. V.; *Creasy* v. *Alverson*, 43 Mo. 13; *Patch* v. *White*, 117 U. S. 210.

REVIEWS.

CRIME; ITS NATURE, CAUSES, TREATMENT, AND PREVENTION. By Sanford M. Green, late Judge of the Supreme and Circuit Courts of Michigan. Philadelphia: The J. B. Lippincott Co., 1889.

This is not a law-book, but was written, the author says, "in the hope that it might be of some value in aiding to solve some of the great social problems that are now agitating the civilized world." On every page we see evidence that the writer is a philanthropist, and while we may not be inclined to consider that the function of the State is so far that of a philanthropist as Judge Green suggests, it is certain that the book teems with facts and suggestions which must furnish food for considerable valuable reflection. Last year a most valuable book on this subject was published in England, written by Mr. Gordon Rylands, and bearing the same title as this work. These authors agree in the main, their few differences being traceable perhaps to the fact that Mr. Rylands views the question from the strictly economical view, in which philanthropy, as such, bears no part. As every good citizen is something of a sociologist, and as nearly all writers agree that the present system for the management of criminals is inadequate, it can be safely asserted that Judge Green's work is worthy of attention.

P. S. R.